REBUTTAL TESTIMONY OF

E. ELIZABETH BEST

ON BEHALF OF

DOMINION ENERGY SOUTH CAROLINA, INC.

DOCKET NO. 2023-9-E

Q. PLEASE STATE YOUR NAME, BUSINESS ADDRESS AND POSITION WITH DOMINION ENERGY SOUTH CAROLINA, INC. ("DESC" OR "COMPANY").

A. My name is E. Elizabeth ("Betty") Best and my business address is 400 Otarre Parkway, Cayce, South Carolina, 29033. I am employed by Dominion Energy Services, Inc. ("Dominion Energy") as Director of Strategic Planning for Dominion Energy South Carolina, Inc. ("DESC" or the "Company").

Q. ARE YOU THE SAME E. ELIZABETH BEST WHO PREVIOUSLY TESTIFIED IN THIS DOCKET?

A. I am.

Q. HAVE YOU REVIEWED THE DIRECT TESTIMONY FILED BY WITNESS ANTHONY SANDONATO AND OTHER WITNESSES ON BEHALF OF THE SOUTH CAROLINA OFFICE OF REGULATORY STAFF ("ORS") IN THIS MATTER?

A. Yes.

Q. HAVE YOU REVIEWED THE DIRECT TESTIMONY OF WITNESS DEREK STENCLIK AND WITNESS JIM GREVATT ON BEHALF OF

THE SOUTH CAROLINA COASTAL CONSERVATION LEAGUE, SOUTHERN ALLIANCE FOR CLEAN ENERGY (COLLECTIVELY, "CCL/SACE"), AND SIERRA CLUB?

A. I have reviewed the joint testimony filed by the witnesses for CCL/SACE and Sierra Club (collectively, "Environmental Intervenors").

Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY?

A. The purpose of my rebuttal testimony is to present an overview of DESC's position related to certain issues raised in the direct testimonies filed on behalf of Environmental Intervenors and ORS.

In general, none of the issues or corrections raised by ORS would change the material conclusions of the IRP or challenge the selection of the Preferred Plan. They are best addressed through the ongoing stakeholder process and in future IRP updates. The ORS specifically indicates that most of its suggestions are best handled in this way.

The Environmental Intervenors also raise issues or corrections that are not material to the conclusions of the IRP or the selection of the Preferred Plan, which also are appropriate to address in future proceedings. But the Environmental Intervenors also raise a number of challenges to the Preferred Plan that are based on factual inaccuracies and unreasonable assumptions. The Company's rebuttal witnesses will provide a detailed review and explanation of these factual errors and unreasonable assumptions. My rebuttal testimony will summarize the Company's

response to the Environmental Intervenors' positions which the Company witnesses will support.

Given the number of issues raised, it is not possible to address them all. The failure to address any issue should not be taken as agreement with it. Except as noted in its rebuttal testimony, or corrected from the stand, DESC stands by all the inputs methodology, assumptions and conclusion of its 2023 IRP.

Q. DO YOU HAVE ANY EXHIBITS TO YOUR TESTIMONY?

A. Yes. **Exhibit __ (EEB-4)** is attached to my testimony. This is an Errata Sheet that identifies corrections to the 2023 IRP.

Q. DO ANY OF THE CORRECTIONS CONTAINED IN THE ERRAT SHEET IMPACT THE ANALYSIS OR CONCLUSIONS OF THE 2023 IRP?

A. No. The changes in the Errata Sheet do not change any of the substantive analysis or conclusion of the 2023 IRP.

Q. WHAT IS YOUR RESPONSE TO THE ISSUES RAISED IN ORS' REPORT AND THE TESTIMONY OF ORS' WITNESSES?

A. The Company agrees with ORS that DESC's 2023 IRP meets all applicable statutory and regulatory requirements. Therefore, the IRP should be accepted as filed and approved by this Commission. ORS recommends that DESC address six specific issues through discussions with the stakeholder group and, if necessary, in future IRP filings or annual updates. DESC agrees to those recommendations which include:

1. Documenting and discussing with stakeholders its statistical analysis of extreme winter weather,
2. Discussing with stakeholders a detailed analyses of its Residential and Commercial class peak load forecast,
3. Continuing to evaluate and discuss commodity forecasts including CO_2 forecasts,
4. Continuing to evaluate and discuss appropriate modeling of integration costs for renewable resources,
5. Continuing to benchmark its production cost modeling in PLEXOS and to discuss those benchmarking evaluations with stakeholders,
6. Evaluating ways to incorporate additional robust risk analyses in future IRPs.

In addition, ORS requests DESC to update the Commission on transmission impacts and the natural gas pipeline capacity availability associated with unit retirements and new resource decisions. DESC agrees with this request and will update the Commission by letter at the time of the hearing and in the 2024 IRP Update which will be filed in March of 2024, only four months after a final order will be issued in this proceeding. The 2022 Generation Retirement Transmission Impact Analysis Report ("the 2022 TIA") was posted by DESC on its Open Access Transmission Tariff ("OATT") web site in March 2023, which is open to the public, and will make workpapers and supporting documentation available to interested parties. I would note that the report itself presents the key assumptions and conclusions underlying it, which

are discussed in more detail in the rebuttal testimony of Company Witness Scott Parker. The workpapers and supporting documentation largely consist of input and output files from DESC's current power flow model and will not likely be of use to other parties.

In addition, ORS requests DESC to provide information in rebuttal testimony concerning several matters.

1. ORS requests further information on potential future rate designs related to the EV charging. I can respond that those rates are a future work in progress. DESC has retained the Guidehouse consulting firm to support modernizing the Company's time of use ("TOU") rates portfolio and to align its pricing strategies to DESC's future system needs. The resulting rate design will communicate pricing signals that encourage EV owners and EV charging providers to shift EV charging load to off-peak hours. That study is in its very initial phases, and there are no conclusions or other information to present at this time. Any new TOU rates will require Commission approval. At present, EV penetration in DESC's service territory remains limited as are load impacts and the Company intends to complete the study and propose TOU rates as EV penetration becomes more meaningful from a resource planning perspective. The Company anticipates these issues to be a matter for consultation with stakeholders as more information becomes available.
2. As Company Witness Jim Neely explains, there was an error in modeling the Low DSM Sensitivity Case (not the Low and the High DSM Sensitivity Cases

as ORS suggests). Witness Neely will provide corrected results for this sensitivity. This revision does not change the Preferred Plan or the analysis on which the Preferred Plan is supported. It relates to a single sensitivity only and is not material to the selection of the Preferred Plan.

3. ORS asks the Company to discuss the proposed Environmental Protection Agency ("EPA") CAA Section 111 Regulation of Greenhouse Gas ("GHG") Emissions from Fossil Fuel-Fired Electric Generating Units ("EGU"). Company Witness Andrew Walker will discuss the current status of the rule, the pathways for complying with it, and the potential impacts a rule of this sort could have on DESC's system. But DESC would ask the Commission to consider that this is a ***proposed*** rule only. It was issued on May 23, 2023, several months after this IRP was filed. It is in the early stages of public comment and is subject to being changed, withdrawn, or fundamentally redrafted before it is issued or invalidated in court afterwards. DESC will include the proposed rule and its potential impacts on DESC's system in future stakeholder discussions and will evaluate its impact on generation planning in future IRP updates. The Company does not believe it is appropriate for DESC to be required to run additional sensitivities on the basis of this proposed rule for submission in rebuttal testimony, as Witness Stenclik for the Environmental Intervenors suggests. Doing so would have been premature, unnecessary and disruptive to the orderly progression of this prefiling and hearing process.

4. Through the rebuttal testimony of Company Witness Neely, DESC will explain that in configuring the PLEXOS model the Company selected one of two heat rates for combined cycle and CT units that was provided by the manufacturer. The heat rate selected was too low for the purpose for which it was used. Witness Neely will explain that this heat rate affects fuel costs by approximately 11% but when taken in context of the full cost of the units, including capital costs and fixed O&M, it is not material to the overall conclusions of the IRP or the selection of the Preferred Plan.

5. Through the rebuttal testimony of Company Witness Walker, DESC will explain the reasonableness of the cost increases associated with generic combustion turbine resources as ORS has requested.

6. Similarly, ORS also proposes that DESC should model an additional sensitivity based on information about higher battery costs that have arisen since the 2023 IRP was filed. Current forecasts of battery costs are now understood to be dramatically higher than assumed in this IRP, as DESC cautioned in its direct testimony could be the case. This new assessment of battery costs is based on the results of the recent RFP for replacement resources for the Urquhart peaking capacity and on recently released 2023 NREL data, the 2022 version of which was the basis for the battery costs modeled in the IRP. The new NREL forecasts are approximately 45% higher than NREL's 2022 forecast which was used in preparation of the 2023 IRP, and the recent RFP results show prices that are higher still. This new price data emerged after the IRP was completed and will

be used in the 2024 IRP Update which is due to be filed March 31, 2024. However, the new data would not change the conclusion that a combined cycle resource will be required to replace Williams and that battery storage is neither feasible nor economical for fully replacing Williams, as Witness Stenclik suggests. As to the replacement of Wateree, it has always been DESC's intention to base the selection of replacement capacity on an RFP that would test the relative cost of battery storage and CT capacity through actual market bids. The new data in no way changes DESC's intention to test the market in this way. Accordingly, there is no practical need to run additional studies. Injecting new studies into this docket in rebuttal testimony would be unnecessary and disruptive to the orderly progression of the prefiling and hearing process.

Q. HOW DO TIMING CONCERNS ABOUT IRPS GENERALLY RELATE TO DESC'S RESPONSES TO THE REQUEST FOR A NEW STUDY?

A. We have now entered the second triennial IRP cycle since S.C. Code Ann. § 58-37-40 was amended. During the first triennial IRP cycle, the Commission directed the parties to undertake comprehensive work to standardize processes, inputs and metrics. The IRP process has taken on a more mature and predictable form as a result and DESC has reviewed, accepted and incorporated multiple recommendations made by the Commission and other parties in this IRP.

But the intensive nature of this process has been challenging, resulting in schedule compression and the due dates for annual IRP updates being reached

before final orders on the underlying IRP or updates have been issued. As we enter the second triennial cycle, getting the sequencing and timing right for IRPs and IRP updates is important, and building on the work done to date, the Commission now has the opportunity to create a sequence and schedule for IRPs that is fair, efficient and effective.

In this context, it is important to remember that utility resource planning is an ongoing process that occurs against a backdrop of constantly changing load forecasts, fuel prices, environmental regulations, and transmission and pipeline construction schedules. An IRP is one part of that ongoing process which provides the Commission and other parties a snapshot in time of the Company's planning templates and processes, its assessment of future customer needs and the current evaluation of the potential resources to best fill those needs. In recognition of their time-limited nature, IRPs are updated annually and the preparation of the updates begin shortly after or even before the orders in the last IRP or update are filed.

In this context, it will be difficult or impossible to conduct orderly planning if each IRP or update has to be updated for matters that arise after it has been prepared. Such updates will be of limited utility since an IRP or update will typically be filed within months of an order from its precursor filing. Furthermore, any siting decisions for new resources will be based on data that are current at the time the siting application is filed. In addition, in many cases procurement decisions will be based not on forecasts of the costs of assets but on binding bids for construction of the assets in question. For these reasons, the Company

respectfully requests the Commission to recognize that except in extraordinary circumstances, an IRP should be based on the data that was current at the time it was prepared and that updates related to interim developments or corrections that do not affect the selection of a preferred plan should wait for future proceedings.

Q. HOW DOES THE COMPANY RESPOND TO WITNESS STENCLIK'S ASSERTION THAT HIS ANALYSIS SHOWS THAT IT IS POSSIBLE TO RETIRE WILLIAMS STATION AS EARLY AS 2029 BY REPLACING IT WITH BATTERY AND SOLAR RESOURCES?

A. Witness Stenclik's assertion that Williams Station can be retired in 2029 is refuted by the 2022 Coal Plants Retirement Study Report filed in Docket No. 2021-192-E, the results of the transmission impact assessment presented in that docket, and in the testimonies of Witnesses Walker, Parker and Neely in this proceeding. Witness Stenclik's assertion that Williams Station can be retired in 2029 is an unsupported assertion. It is not based on any engineering analysis, operational testimony or transmission modeling that calls into question the Company's engineering analysis, operational testimony and transmission modeling, all of which show that the cost of battery resources to replace Williams and the cost of transmission upgrades to support those battery resources makes his proposal untenable.

Q. PLEASE DESCRIBE DESC'S 2022 TIA AND DISCUSS WHETHER IT SUPPORTS WITNESS STENCLIK'S ASSERTION THAT IT IS POSSIBLE

TO RETIRE WILLIAMS STATION AS EARLY AS 2029 BY REPLACING IT WITH BATTERY AND SOLAR RESOURCES?

A. In March of 2023, DESC's Transmission Planning group issued its 2022 TIA for DESC's Wateree and Williams Generating Plans. It was conducted under transmission planning criteria and methodology filed with the National Electric Reliability Council ("NERC") using power flow models that are updated continuously and submitted annually for NERC review. When issued, DESC posted the 2022 TIA on its OATT web site which is open to the public and its was available to Witness Stenclik and the Environmental Intervenors months before his direct testimony was filed in this docket. The 2022 TIA has specific relevance to his claim that it is possible to retire Williams as early as 2029 by replacing it with battery and solar resources.

Among other scenarios, the 2022 TIA analyzed the transmission impacts of retiring Williams and siting either a 100 MW, 200 MW or 300 MW four-hour battery storage resource at the Williams site, supplemented by 757 MW of natural gas capacity at Canadys. The assessment found that maintaining reliable service to customers would require significant transmission improvements under either of the three approaches, and that the necessary transmission construction would require between 4.5 years in the best case and 6 years in the worst case. The best and worst cases were defined by the options Santee Cooper provided concerning the potential retirements of its coal fired generation resources in the South Carolina Low

Country and Myrtle Beach area, with the early retirement of the Winyah plant defining the worst case.

In the worst case analysis, adding battery storage of 100 MW to 300 MW at Williams would make no difference in the cost or schedule of the required transmission upgrades. In the best case, adding a 100 MW battery at Williams would have no impact on transmission cost or schedule. Adding a 200 MW battery would result in a reduction of approximately 37% in transmission cost and a reduction in the construction schedule from six to four and a half years. But going from a 200 MW battery to a 300 MW battery would result in no further reduction in either cost or schedule. This analysis indicates that under some conditions, there could be a transmission benefit to locating a 200 MW battery at Williams, but there is no basis to believe that adding additional battery capacity beyond 200 MW at Williams is a practical way to further improve cost and schedule of transmission upgrades or avoid the need for a major transmission upgrade to support the retirement of Williams. Even with the 200 MW battery at Williams, and in the best case scenario, the transmission upgrade will take approximately 4.5 years to complete after all procurement, siting and permitting is in hand. This information testimony is entirely inconsistent with Witness Stenclik's assumption that retiring Williams before 2029 becomes practical by siting hundreds of MW of battery resources at Williams.

Q. WHY IS THIS THE CASE?

A. Company Witnesses Walker and Parker testify as to the reasonableness of the conclusions reached in the 2022 TIA. Transmission into the Charleston area is highly stressed even today and Williams is currently being treated as a must-run unit much of the time, meaning that it must be kept on line to support reliable service to the Charleston area even when less costly resources are available elsewhere on the system. This is required because with Williams offline, transmission is stressed such that routine transmission maintenance and the response to routine events on the transmission system around Charleston put reliability at risk.

Batteries are energy limited resources. They cannot operate as must-run resources because they must be taken off line for extended periods of time to be recharged. As Witness Parker testifies, when batteries are off line they not only represent a loss of generation support to the system, which the Charleston area can ill afford, they also represent a new load that the transmission system must support at the same time that it is supporting the customer load in the Charleston area. Witness Stenclik's unsupported assumption that batteries located at Williams Station can replace the capacity it represents is an unreasonable and dangerous assumption from a resource planning perspective. It puts reliable service to the Charleston area at risk.

Q. IS WITNESS STENCLIK ACCURATE IN STATING THAT DESC'S OWN DELAYS ARE PREVENTING WILLIAMS FROM BEING RETIRED EARLIER THAN 2030?

A. Absolutely not. The decision to study the early retirements of Williams and Wateree were made in support of Dominion Energy's enterprise-wide goal of reaching net zero carbon and methane emissions by 2050, while maintaining the Company's fundamental objectives to operate safely, maintain reliability, and deliver affordable energy to our customers. In the 2020 IRP, Company Witness Eric Bell informed the Commission through his rebuttal testimony of the Company's plans to conduct detailed retirement studies for potential early retirement candidates, including Wateree and Williams, and publicly committed the Company to do so at that time. This was in part in response to a proposal by ORS that the Company should prepare a detailed retirement study and file it with the Commission but also reflected decision making that was already in process at the time. . The study was not due to any mechanical or engineering issues with the plant or any inability to operate it reliably and efficiently going forward. As explained in more detail in the rebuttal testimony of Company Witness Walker, DESC began taking steps to study the retirement and replacement options for Williams and Wateree as soon as the decision was made to retire the plants if replacing them was practical. DESC prepared a Coal Plants Retirement Study in 2022 which it presented to the Commission in Docket No. 2021-192-E. That study thoroughly evaluated the retirement dates for both Williams and Wateree and laid

out a planning process and timeline for retirement which serves as a reasonable planning assumption to ensure reliable service is maintained through the retirement process. The Company has prepared multiple requests for transmission impact analyses to support its decision making, has located a preferred site for the replacement generation at the Canadys site, and is pursing gas supply resources to support replacement as well as a potential joint venture with Santee Cooper to increase economies of scale. The Company has not delayed this process in any way.

Q. HOW DOES THE COMPANY RESPOND TO THE ALTERNATIVE BUILD PLANS WITNESS STENCLIK HAS CREATED?

A. In addition to assuming under some portfolios that Williams can be retired and replaced by 2029, which is not the accurate, the alternative portfolios that Witness Stenclik presents are based on multiple factual errors and incorrect assumption including the following:

1. In his Alternative Coal 2029 Enhanced Reliability Portfolio, Witness Stenclik assumed reductions in load from DSM programs that are 30 times higher than the medium DSM case supported by the 2023 DSM Potential Study, 20 times higher than the DESC High DSM case, and nine times greater than the DSM reductions calculated by the Environmental Intervenors' own witness, Witness Gravett.
2. In that same analysis, Witness Stenclik inflated the DSM load reductions without including any increase in DSM program costs. The omitted costs are material

and in themselves are sufficient to make the Alternative Coal 2029 Enhanced Reliability Portfolio a high cost option.

3. In all scenarios, Witness Stenclik took NREL's 2022 forecast of battery costs, which DESC had indicated already appeared to be too low, and reduced them by another 10%. We now know that NREL's 2023 forecast of battery costs is 45% higher, not 10% lower, than its 2022 forecast. This difference in price is material because all of Witness Stenclik's scenarios more than double the build of battery capacity than is assumed in the Company's Reference Case.

4. Witness Stenclik based his 10% reduction in battery cost on his assertion that large parts of DESC's service territory would qualify for bonus tax benefits under the Inflation Reduction Act. This is not accurate. We now know that only a very small portion of DESC's service territory will qualify. Witness Neely provides a map demonstrating the limited availability of these bonus tax benefits in DESC's service territory.

5. Witness Stenclik assumed that the tax benefits under the Inflation Reduction Act would not sunset in 2035 as the Act provides, assuming that the nation meets certain CO_2 reduction targets. This is a speculative assumption, particularly in light of the assumption under the Reference Case that significant costs are imposed on CO_2 emissions beginning in 2030.

6. In all his scenarios, Witness Stenclik assumed that solar resources had a capacity factor higher than both the NREL range of capacity factors and the historical data from DESC's service territory. In so doing, he ignored the fact that solar

resources degrade at 0.5% per year as reflected in DESC's assumed capacity factor.

7. In all his scenarios, Witness Stenclik assumed minimum run and down times for combined cycle natural gas plants and large frame combustion turbines that are a fraction of the actual minimum run and down times for those units that are dispatched by DESC and are inconsistent with how DESC actually operates them. These runtimes are analogous to the redline on an automobile tachometer, they are suitable for emergencies but not normal system operations. As Witness Walker testifies, dispatching those units as Witness Stenclik's model assumes would greatly increase maintenance costs, reduce the useful lives of these very expensive assets, and reduce their reliability. Not only are these run-time assumptions inaccurate, but the analysis is further biased from a cost basis. It assumes a reduction in system cost because fewer natural gas fired plants are needed to respond to the intermittency of solar and other variations in load, and solar can be integrated onto the system more cheaply, which biases the analysis in favor of solar. But the analysis makes no adjustments for increased maintenance costs, increased force outage rates, and loss of long-term asset value resulting in higher depreciation and replacement costs that are a result of the unreasonable assumptions as to run times.

Q. WITNESS STENCLIK'S ALTERNATIVE PORTFOLIOS MAY SEEM WITHOUT CAREFUL READING TO SHOW THAT RETIRING WILLIAMS STATION AND REPLACING IT WITH BATTERY AND

SOLAR RESOURCES IS AN OPTION THAT OPTIMIZATION MODELING SELECTS. IS THAT THE CASE?

A. Witness Stenclik's testimony is not entirely clear on this point, but as Witness Neely testifies, Witness Stenclik's model only selects battery and solar resources to replace Williams because Witness Stenclik manually instructed it not to select a combined cycle unit when Williams is replaced. Witness Neely has run Witness Stenclik's model without that instruction and has confirmed that in spite of its other biases against natural gas generation, the model continues to select the combined cycle resource to replace Williams. This is a clear validation of the choice made in DESC's Preferred Plan.

Q. IS WITNESS STENCLIK ACCURATE IN CLAIMING "DESC HAS A FINANCIAL INCENTIVE TO RECOVER COSTS ASSOCIATED WITH NEW CAPITAL PROJECTS COSTING HUNDREDS OF MILLIONS OF DOLLARS AND IS INDIFFERENT TO FUEL COSTS BECAUSE THOSE ARE PASSED ON TO CUSTOMERS"?

A. No. DESC's core commitment to customers and the public is to provide safe, reliable, affordable and increasingly clean electric service. It succeeds as a company when its rates are fair and the service it provides is recognized as a good value by its customers. To meet those goals, DESC's priority is providing its system with low-cost resources that meet the demands and needs of the customer base safely, reliably and with reduced emissions. DESC has a regulatory duty to make reasonable and prudent decisions which it takes very seriously. These are the

considerations that drive DESC's generation planning decisions. As a regulated utility, DESC, and to a large degree ORS as well, are accountable in ways other parties are not. If the Company makes resource procurement decisions that create an unreliable system, or if it pursues generation resources that unnecessarily increase rates, it faces real-world anger and criticism from the customers and communities it serves and repercussions in proceedings before this Commission. Other parties, apart from ORS, do not face similar accountability for the proposals they advance and it is not surprising that proposals from other parties often are based on extreme assumptions and biased inputs, and put both reliability and affordability at risk. DESC's goals as a company require it to base its generation planning on reasonable assumptions and unbiased inputs, and that is what it has done here.

Q. IS WITNESS STENCLIK ACCURATE IN CLAIMING THAT DESC'S MODELING SHOWS A "CLEAR AND CONSISTENT BIAS" TOWARDS NEW GAS CAPACITY, SPECIFICALLY THE SHARED COMBINED CYCLE RESOURCE IN THE PREFERRED PLAN?

A. No. In all cases, DESC's modeling is based on reasonable inputs, and assumptions. DESC's analysis has chosen to add thousands of MW of solar and battery resources under each portfolio modeled. It has also chosen to add natural gas fired resources, albeit in more limited MW amounts, because without natural gas fired resources solar and battery resources would be unreliable and their

expense would be unreasonable. The only bias in DESC's modeling is a bias in favor of reliability and affordability.

Q. WHAT IS THE COMPANY'S RESPONSE TO WITNESS STENCLIK'S RECOMMENDATION TO INCORPORATE THE PROPOSED NEW EPA GREENHOUSE GAS RULE IN THE PLANNING ANALYSIS FOR THIS IRP?

A. We disagree with this proposal. For the same reasons I discussed above, incorporating the proposed GHG rule in this IRP would be premature and disruptive.

Q. WHAT IS YOUR RESPONSE TO THE ISSUES RAISED IN THE TESTIMONY OF WITNESS GREVATT ON BEHALF OF CCL/SACE AND SIERRA CLUB REGARDING THE 2023 DSM POTENTIAL STUDY?

A. A more detailed response is provided in the rebuttal testimony of Witness Drew Durkee. However, I will emphasize that the 2023 DSM Potential Study is the assessment by a third party of the achievable DSM results in DESC's service territory. It was conducted with extensive stakeholder input using accepted methodology and extensive data on DSM programs nationally and on the specific potential in DESC's service territory. For system planning purposes, it is an entirely appropriate source of inputs into this IRP and will be subject to detailed review when DESC files a new DSM plan for Commission approval in a future docket. Challenges to the study should be brought in that DSM docket.

Q. DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?

A. Yes.